

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, and TERRENCE DRAIN on behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

**BILL OLDHAM**, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; **ROBERT MOORE**, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; **CHARLENE McGHEE**, in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee; **DEBRA HAMMONS**, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; **SHELBY COUNTY, TENNESSEE**, a Tennessee municipality; and **TYLER TECHNOLOGIES, INC.**, a foreign corporation,

DEFENDANTS.

**Case No. 2:16-cv-2907-SHM/tmp**

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE CIVIL RIGHTS  
ACT OF 1871, 42 U.S.C. § 1983, AND  
TENNESSEE COMMON LAW**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV. PRO. 38(a)  
& (b)**

**NOTICE OF SERVICE OF RESPOSNES TO SHELBY COUNTY DEFENDANTS'  
FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENT OF PLAINTIFF SCOTT TURNAGE**

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, and Terrence Drain, on behalf of themselves and all other similarly situated persons, by and through their designated attorneys and, pursuant to Local Rule 26.1(a)(2), provide this Notice that on November 8, 2017, Plaintiffs served Plaintiff Terrence Drain's Responses to Shelby County Defendants' First Set of Interrogatories and First Set of Requests for Production of Documents

Respectfully submitted,

/s/ William E. Cochran, Jr.

Michael G. McLaren (#5100)  
William E. Cochran, Jr. (#21428)  
Brice M. Timmons (#29582)  
BLACK McLAREN JONES RYLAND & GRIFFEE PC  
530 Oak Court Drive, Suite 360  
Memphis, TN 38117  
(901) 762-0535 (Office)  
(901) 762-0539 ( Fax)  
[wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com)

Frank L. Watson, III (Tenn. Bar No. 15073)  
William F. Burns (Tenn. Bar No. 17908)  
WATSON BURNS, PLLC  
253 Adams Avenue  
Memphis, Tennessee 38104  
Phone: (901) 529-7996  
Fax: (901) 529-7998  
Email: [fwatson@watsonburns.com](mailto:fwatson@watsonburns.com)  
Email: [bburns@watsonburns.com](mailto:bburns@watsonburns.com)

Claiborne Ferguson (Tenn. Bar No. 20457)  
Attorney for Plaintiffs and the Class  
THE CLAIBORNE FERGUSON LAW FIRM P.A.  
294 Washington Avenue  
Memphis, Tennessee 38103  
[Claiborne@midsouthcriminaldefense.com](mailto:Claiborne@midsouthcriminaldefense.com)

Joseph S. Ozment (Tenn. Bar No. 15601)  
THE LAW OFFICE OF JOSEPH S. OZMENT, PLLC  
1448 Madison Ave.  
Memphis, Tennessee 38104  
Phone: (901) 525-4357  
Email: [jozment@oz-law.net](mailto:jozment@oz-law.net)

*Counsel for Plaintiffs and the putative Class  
Members*

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on November 8, 2017, the foregoing was served the Court's ECF filing system on:

Robert E. Craddock, Esq.  
Odell Horton, Jr., Esq.  
Amber D. Floyd, Esq.  
WYATT, TARRANT & COMBS, LLP  
1715 Aaron Brenner Drive, Suite  
800  
Memphis, Tennessee 38120  
(901) 537-1000  
Email: [rcraddock@wyattfirm.com](mailto:rcraddock@wyattfirm.com)  
Email: [ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)  
Email: [afloyd@wyattfirm.com](mailto:afloyd@wyattfirm.com)

Emmett Lee Whitwell, Esq.  
SHELBY COUNTY ATTORNEY'S  
OFFICE  
160 N. Main Street  
Suite 950  
Memphis, TN 38103  
(901)222-2100  
Email:  
[lee.whitwell@shelbycountyttn.gov](mailto:lee.whitwell@shelbycountyttn.gov)

*Counsel for Defendants Bill Oldham,  
Robert Moore, Charlene McGhee,  
Debra Hammons and Shelby County,  
Tennessee*

Bradley E. Trammell, Esq.  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue  
Suite 2000  
Memphis, Tennessee 38103  
(901) 577-2121  
Email:  
[btrammell@bakerdonelson.com](mailto:btrammell@bakerdonelson.com)

Beth Bivans Petronio, Esq.  
K&L GATES, LLP  
1717 Main Street  
Suite 2800  
Dallas, Texas 75201  
(9214) 939-5815  
Email: [beth.petronio@klgates.com](mailto:beth.petronio@klgates.com)

*Counsel for Defendant Tyler  
Technologies, Inc*

/s/ William E. Cochran, Jr.